

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT SOUTH CAROLINA  
Columbia Division**

DISABILITY RIGHTS SOUTH  
CAROLINA, ABLE SOUTH CAROLINA,  
AMANDA McDOUGALD SCOTT,  
individually and on behalf of P.S., a minor;  
MICHELLE FINNEY, individually and on  
behalf of M.F., a minor; LYUDMYLA  
TSYKALOVA, individually and on behalf  
of M.A., a minor; EMILY POETZ,  
individually and on behalf of L.P., a minor;  
SAMANTHA BOEVERS, individually and  
behalf of P.B., a minor; TAMICA GRANT,  
individually and on behalf of E.G. a minor;  
CHRISTINE COPELAND individually and  
on behalf of L.C. a minor; HEATHER  
PRICE individually and on behalf of H.P. a  
minor; and CATHY LITTLETON  
individually and on behalf of Q.L. a minor,

*Plaintiffs,*

v.

HENRY McMASTER, in his official  
capacity as Governor of South Carolina;  
ALAN WILSON, in his official capacity as  
Attorney General of South Carolina;  
MOLLY SPEARMAN, in her official  
capacity as State Superintendent of  
Education; GREENVILLE COUNTY  
SCHOOL BOARD; HORRY COUNTY  
SCHOOL BOARD; LEXINGTON  
COUNTY SCHOOL BOARD ONE;  
OCONEE COUNTY SCHOOL BOARD;  
DORCHESTER COUNTY SCHOOL  
BOARD TWO; CHARLESON COUNTY  
SCHOOL BOARD; and PICKENS  
COUNTY SCHOOL BOARD,

*Defendants.*

Case No. 3:21-cv-02728-MGL

**Application/Affidavit for  
*Pro Hac Vice* Admission**

- | Court                     | Date Admitted | Good Standing   |
|---------------------------|---------------|---|
| District of Columbia      | 9/9/2011      | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| Maryland                  | 12/16/2010    | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| Maryland District Court   | 9/23/2015     | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| Eastern District of Texas | 4/17/2015     | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |

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- (7) Pending Disciplinary Matters. Are you presently the subject of any formal suspension or disbarment proceedings, and have you been notified by any disciplinary agency of the initiation of formal procedures? ..... ☐ Yes ☒ No  
(If "yes," give particulars, such as jurisdiction, court, date, grounds. Information to comply with this paragraph may be provided *in camera* but that fact shall be revealed below.)
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- (8) Curtailment of Prior *Pro Hac Vice* Admissions. Have you ever had any application for admission *pro hac vice* in this or any other jurisdiction denied or any *pro hac vice* admission revoked?  
☐ Yes ☒ No  
(If "yes," give particulars, such as date, court, docket number, judge, circumstances; attach a copy of any order of denial or revocation.)
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- (9) Sanctions. Have you ever had any certificate or privilege to appear and practice before any judicial or administrative body suspended or revoked, or received a public reprimand or greater sanction?  
☐ Yes ☒ No  
(If "yes," give particulars, e.g., judicial or administrative body, date of suspension, and reinstatement.)
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- (10) Criminal Sanctions. Have you ever been convicted of a felony under the laws of the District of Columbia or of any State or under the laws of the United States?  
☐ Yes ☒ No  
(If "yes," give particulars, such as date, court, judge, circumstances, and ultimate disposition.)
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- (11) Present and Previous *Pro Hac Vice* in this Court. Have you, within the last ten (10) years, filed an application to appear *pro hac vice* in the United States District Court for the District of South Carolina or another court in the state of South Carolina?  
☐ Yes ☒ No  
(If "yes," give court, case name, docket number, and status of litigation, year of application, local counsel of record in each case, and state whether application is pending or was granted.) Attach additional pages if necessary.
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- (12) Designated Local Counsel. Local counsel of record associated with Applicant in this case is:  
Attorney Name: Allen Chaney  
Firm Name: American Civil Liberties Union of South Carolina  
Street Address or Post Office Box: P.O. Box 20998  
City, State, and Zip Code: Charleston, SC 29413  
Telephone Number: 843-282-7953  
E-Mail Address: achaney@aclusc.org  
I understand that local counsel of record is required to: (1) personally sign each pleading, motion, discovery procedure, or other document served or filed in this Court; (2) accept service of all

pleadings and notices as required on behalf of all counsel for the party represented; (3) be present at all pretrial conferences, hearings and trials, unless excused by the Court; (4) be prepared to participate actively as may be necessary; and (5) assure compliance with Local Civil Rules 83.I.04, 83.I.05, and 83.I.06 or Local Criminal Rules 57.I.04, 57.I.05, and 57.I.06 as appropriate. Local counsel of record may attend discovery proceedings.

- (13) Associated Counsel. In addition to local counsel designated above, the following counsel are also associated with the undersigned in this case.

Rita Bolt-Barker (Federal Bar No. 10566)  
Adam Protheroe (Federal Bar No. 11033)  
B. Randall Dong (Fed. Ct. ID 5989)  
Anna Maria Conner (Fed. Ct. ID 5532)  
Amanda C. Hess (Fed. Ct. ID 10303)  
John Freedman (motion for pro hac vice forthcoming)  
Louise Melling (motion for pro hac vice forthcoming)  
Susan Mitzner (motion for pro hac vice forthcoming)

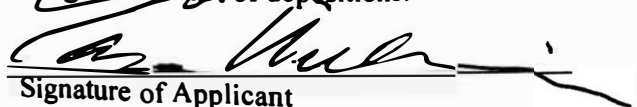
- (14) Application Fee. I affirm that the application fee of three hundred and fifty dollars (\$350) has been paid in accordance with Local Civil Rule 83.I.05 or Local Criminal Rule 57.I.05 or paid herewith.

- (15) Electronic Notification. By submitting this application, I consent to electronic notification.

- (16) Represented Party/Parties. I seek to represent the following party/parties:

DISABILITY RIGHTS SOUTH CAROLINA  
ABLE SOUTH CAROLINA  
AMANDA McDOUGALD SCOTT, individually and on behalf of P.S., a minor  
MICHELLE FINNEY, individually and on behalf of M.F., a minor  
LYUDMYLA TSYKALOVA, individually and on behalf of M.A., a minor  
EMILY POETZ, individually and on behalf of L.P., a minor  
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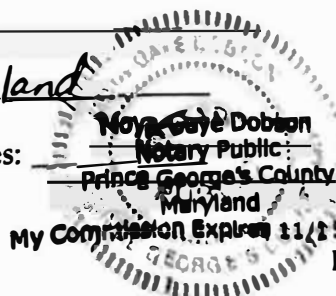
- (17) I certify that I have read Local Civil Rule 30.04 regarding the conduct of depositions.

  
Signature of Applicant

Sworn to and subscribed before me  
this 30<sup>th</sup> day of August, 2021.

  
A Notary Public  
of the State of Maryland

My Commission expires:



Revised 08/15/2020